

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Industrial Dielectrics, Inc.  
407 S. 7<sup>th</sup> St.  
Noblesville, IN 46060**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T057-7683-00042	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary plastic and plastic resin production plant that operates fiberglass molding, lamination, and pultrusion facilities and that produces a bulk molding compound, plastic sheets, and plastic component parts.

Responsible Official: Jay Merrell  
Source Address: 407 S. 7<sup>th</sup> St., Noblesville, IN  
Mailing Address: P. O. Box 357 Noblesville, IN 46060  
Phone Number: 317 / 773 - 1766  
SIC Code: 3087  
County Location: Hamilton  
County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Minor Source, under PSD or Emission Offset Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.
- (b) One plastic sander, identified as SN<sub>1</sub> for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B<sub>3</sub>, and exhausting to stack S<sub>1</sub>.
- (c) Two mixers, identified as M<sub>1</sub> and M<sub>2</sub>, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>2</sub>.
- (d) Two sheet molding compound mixers, identified as M<sub>3</sub> and M<sub>4</sub>, for sheet molding compound production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>3</sub>.
- (e) Nine bulk molding compound mixers, identified as M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B<sub>4</sub>, and all exhausting to stack S<sub>4</sub>.
- (f) One bulk molding compound scale, identified as SC<sub>1</sub>, connected to mixers M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, with a maximum capacity of 11,970 pounds (1330 pounds X 9 lines) per hour, equipped with baghouse B<sub>4</sub> and exhausting to stack S<sub>4</sub>.
- (g) One electric oven, identified as O<sub>1</sub>, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.

- (h) One fiberglass pultrusion molding machine, identified as  $P_1$ , for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses,  $B_5$  and  $B_6$ , and exhausting to stack  $S_7$ .
- (i) Two bulk molding compound (lab) mixers, identified as  $M_{14}$  and  $M_{15}$ , for bulk molding compound production, each with a maximum capacity of 66 pounds per hour, with no pollution control equipment and exhausting inside the building, with no outside exhaust.
- (j) One grinder, identified as  $G_1$ , for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse  $B_7$ , and exhausting to stack  $S_6$ .

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or
  - (2) having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Stationary fire pumps.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (k) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (l) Five aboveground polyester resin storage tanks, identified as  $T_1$  -  $T_5$ , each with a maximum capacity of 6,200 gallons, each equipped with one vent,  $V_1$  -  $V_5$ , and each with the potential to emit less than 5 tons VOC/year.
- (l) One underground styrene storage tank, identified as  $T_6$ , with a maximum capacity of 4,000 gallons, equipped with vent  $V_6$ , with the potential to emit less than 1 ton styrene/year.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### **B.2 Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.6 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within 90 days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,  
Compliance Section),  
or

Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit;  
or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification** [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act** [326 IAC 2-7-20(b)]

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).



(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]  
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- 
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.



- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, each with a maximum capacity of 200 pounds per hour, and each equipped with a single stage workshop-type vacuum/bag, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.
- (b) One plastic sander, identified as SN<sub>1</sub> for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B<sub>3</sub>, and exhausting to stack S<sub>1</sub>.
- (c) Two mixers, identified as M<sub>1</sub> and M<sub>2</sub>, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>2</sub>.
- (d) Two sheet molding compound mixers, identified as M<sub>3</sub> and M<sub>4</sub>, for sheet molding compound production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>3</sub>.
- (e) Nine bulk molding compound mixers, identified as M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B<sub>4</sub>, and all exhausting to stack S<sub>4</sub>.
- (f) One bulk molding compound scale, identified as SC<sub>1</sub>, connected to mixers M<sub>5</sub> - M<sub>13</sub>, for bulk molding compound production, with a maximum capacity of 11,970 pounds (1330 pounds X 9 lines) per hour, equipped with baghouse B<sub>4</sub> and exhausting to stack S<sub>4</sub>.
- (g) One electric oven, identified as O<sub>1</sub>, for treatment of unusable raw materials prior to disposal, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.
- (h) One fiberglass pultrusion molding machine, identified as P<sub>1</sub>, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B<sub>5</sub> and B<sub>6</sub>, and exhausting to stack S<sub>7</sub>.
- (i) Two bulk molding compound (lab) mixers, identified as M<sub>14</sub> and M<sub>15</sub>, for bulk molding compound production, each with a maximum capacity of 66 pounds per hour, with no pollution control equipment and exhausting inside the building, with no outside exhaust.
- (j) One grinder, identified as G<sub>1</sub>, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B<sub>7</sub>, and exhausting to stack S<sub>6</sub>.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

- (b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 250 tons per year, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass facilities shall not exceed the rates outlined below:

Facility	P = process weight tons/hr	E=allowable emissions lbs/hr
Plastic sheet processes (B <sub>1,2,3</sub> )	.3075	1.86
Bulk molding processes (B <sub>4</sub> )	4 lines X 0.665 = 2.66	7.90
Fiberglass pultrusion processes (B <sub>5,6</sub> )	0.0545	0.58
Fiberglass chips processes (B <sub>7</sub> )	0.25	1.62

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

- (a) Mixers M<sub>1</sub>, M<sub>2</sub>, M<sub>3</sub>, M<sub>4</sub>, M<sub>14</sub>, M<sub>15</sub>, scale SC<sub>1</sub>, oven O<sub>1</sub>, pultrusion machine P<sub>1</sub>, and seven bulk molding compound lines with mixers M<sub>5</sub> - M<sub>11</sub> were constructed prior to Jan 1, 1980, so 326 IAC 8-1-6 does not apply to those units. Bulk molding compound lines with mixers M<sub>12</sub> and M<sub>13</sub> were constructed in 1996, and each have PTE VOC greater than 25 tons per year. Therefore, VOC emissions from M<sub>12</sub> and M<sub>13</sub> shall be limited to less than 25 tons per 12 consecutive month period, each, by limiting input VOC such that:

$$\frac{\text{Pounds of VOC per Gallon coating}}{(\text{lb/gal})} * \frac{\text{Gal. of material}}{(\text{gal/lb.})} * 1330 \text{ lbs/hr} * (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lbs}) * \text{flash off factor} < 25 \text{ tons/year} \\ (3 \%)$$

This limitation, based on maximum production of 1330 lbs/hr and a flash off factor of 3%, will prevent VOC emissions from the 8<sup>th</sup> and 9<sup>th</sup> bulk molding compound lines from being greater than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable.

- (b) Should VOC input to mixers M<sub>12</sub> or M<sub>13</sub> reach or exceed the amounts allowed by the above equation per 12 consecutive month period, the source shall acquire the approval of a BACT plan, pursuant to 326 IAC 8-1-6, before such input may occur.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.7 VOC Emissions**

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage to mixers  $M_{12}$  and  $M_{13}$  for the most recent month.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Particulate Matter (PM)**

Pursuant to CP 057-4373-00042 issued on May 13, 1996, the vacuum/baghouses  $B_{1,2}$  for PM control shall be in operation at all times the sawing processes are in operation. Baghouse  $B_3$  shall be in operation at all times the sander is in operation. Baghouse  $B_4$  shall be in operation at all times the bulk molding compound processes are in operation. Baghouses  $B_{5,6}$  shall be in operation at all times the fiberglass pultrusion molding machines are in operation. Baghouse  $B_7$  shall be in operation at all times the fiberglass chips processes are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.9 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.3.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;

- (4) The total input of bulk molding compound, polyester laminate and polyester pultrusion materials for the fiberglass molding processes for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Industrial Dielectrics, Inc.  
Source Address: 407 South 7<sup>th</sup> Street Noblesville, IN  
Mailing Address: P. O. Box 357 Noblesville, IN 46060  
Part 70 Permit No.: T057-7683-00042

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Industrial Dielectrics, Inc.  
Source Address: 407 S. 7<sup>th</sup> St. Noblesville, IN  
Mailing Address: P. O. Box 357 Noblesville, IN 46060  
Part 70 Permit No.: T057-7683-00042

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Industrial Dielectrics, Inc.  
Source Address: 407 S. 7<sup>th</sup> Street Noblesville, IN  
Mailing Address : P. O. Box 357 Noblesville, IN 46060  
Part 70 Permit No.: T057-7683-00042  
Facility: 8<sup>th</sup> and 9<sup>th</sup> Bulk Molding Compound Lines with Mixers M<sub>12</sub> and M<sub>13</sub>  
Parameter: VOC emission  
Limit: less than 25 tons per 12 consecutive month period for each Mixer

YEAR: \_\_\_\_\_ MIXER \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Industrial Dielectrics  
Source Address: 407 S. 7<sup>th</sup> Street Noblesville, IN  
Mailing Address: P. O. Box 357 Noblesville, IN 46060  
Part 70 Permit No.: T057-7683-00042

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

**Source Name:** Industrial Dielectrics, Inc  
**Source Location:** 407 S. 7<sup>th</sup> St., Noblesville, IN 46060  
**County:** Hamilton  
**SIC Code:** 3087  
**Operation Permit No.:** T057-7683-00042  
**Permit Reviewer:** B. J. Goldblatt

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Industrial Dielectrics, Inc. relating to the operation of a fiberglass molding, lamination, and pultrusion plant.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, connected to sander SN<sub>1</sub>, with SN<sub>1</sub> capacity of 615 pounds per hour, each saw equipped with an indoor baghouse, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.
- (b) One plastic sander, identified as SN<sub>1</sub> for plastic sheet production, with a maximum capacity of 615 pounds per hour, equipped with baghouse B<sub>3</sub>, and exhausting to stack S<sub>1</sub>.
- (c) Two mixers, identified as M<sub>1</sub> and M<sub>2</sub>, for fiberglass sheet production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>2</sub>.
- (d) Two sheet molding compound mixers, identified as M<sub>3</sub> and M<sub>4</sub>, for sheet molding compound production, each with a maximum capacity of 313 pounds per hour, and both exhausting to stack S<sub>3</sub>.
- (e) Seven bulk molding compound mixers, identified as M<sub>5</sub> - M<sub>11</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, all equipped with the same baghouse B<sub>4</sub>, and all exhausting to stack S<sub>4</sub>.
- (f) One bulk molding compound scale, identified as SC<sub>1</sub>, connected to mixers M<sub>5</sub> - M<sub>11</sub>, and to unpermitted mixers M<sub>12</sub> - M<sub>13</sub>, for bulk molding compound production, with a maximum capacity of 11,970 pounds (1330 pounds X 9 lines) per hour, equipped with baghouse B<sub>4</sub> and exhausting to stack S<sub>4</sub>.
- (g) One heat molded bulk molding compound electric oven, identified as O<sub>1</sub>, for heat molded bulk molding compound production, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.
- (h) One fiberglass pultrusion molding machine, identified as P<sub>1</sub>, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B<sub>5</sub> and B<sub>6</sub>, that exhaust within the building, with no outside exhaust.
- (i) Two bulk molding compound (lab) mixers, identified as M<sub>14</sub> and M<sub>15</sub>, for bulk molding compound production, each with a maximum capacity of 66 pounds per hour, with no pollution control equipment and exhausting inside the building, with no outside exhaust.

- (j) One grinder, identified as G<sub>1</sub>, for fiberglass chips production, with a maximum capacity of 500 pounds per hour, and equipped with baghouse B<sub>7</sub>, and exhausting to stack S<sub>6</sub>.

### Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) Two bulk molding compound mixers, installed in 1996, and identified as M<sub>12</sub> and M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, equipped with the same baghouse B<sub>4</sub> as mixers M<sub>5</sub> - M<sub>11</sub>, and all exhausting to stack S<sub>4</sub>.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or
  - (2) having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) Stationary fire pumps.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (k) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (l) Five aboveground polyester resin storage tanks, identified as T<sub>1</sub> - T<sub>5</sub>, each with a maximum capacity of 6,200 gallons, and each equipped with one vent, V<sub>1</sub> - V<sub>5</sub>, and each with the potential to emit less than 5 tons VOC/year.
- (m) One underground styrene storage tank, identified as T<sub>6</sub>, with a maximum capacity of 4,000 gallons, and equipped with vent V<sub>6</sub>, with the potential to emit less than one ton styrene/year.

## Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Construction Permit 057-4373-00042, issued on May 13, 1996.

All conditions from the previous approval were incorporated into this Part 70 permit, except for the following:

Construction Permit 057-4373-00042, issued May 13, 1996:

Pollution Control Equipment. Permitted and Unpermitted Emission Units and Pollution Control Equipment are outlined in this document, pages 1 and 2, and will replace Pollution Control Equipment listed in Construction Permit 057-4373-00042, issued May 13, 1996:

- (a) Since 1996, the hydrostatic precipitator on the sanded plastic sheets station was replaced with baghouse B<sub>3</sub>.
- (b) The eighth bulk molding compound line was replaced (with mixer M<sub>12</sub>) and a ninth bulk molding compound line was added (with mixer M<sub>13</sub>) to the operation, equipped with baghouse B<sub>4</sub> and exhausting to stack S<sub>4</sub>.
- (c) Fewer stacks currently exist than were reported in CP 057-4373-00042.
- (d) A fifth aboveground polyester resin storage tank, not listed in CP 057-4373-00042, is currently in operation. The five polyester resin storage tanks and the styrene storage tank, listed as emission units in CP 057-4373-00042, are classified as insignificant facilities in this Title V permit.

Operation Conditions. Condition #4 "That the input of bulk molding compound, polyester laminate and polyester pultrusion materials for the fiberglass molding processes shall be limited such that the production is equivalent to VOC emissions of 249tons/365 day period, rolled on a daily basis. During the first 365 days of operation, the input material usage shall be limited such that the total VOC emissions divided by the accumulated days of operation shall not exceed 1,364 pounds per day." shall not be incorporated in this Part 70 permit. In 1996, Industrial Dielectrics, Inc. reported that the PTE VOC's had been miscalculated in previous permit applications. The corrected PTE VOC's is less than 250 tons/year. Therefore, VOC emissions from entire source shall not be limited.

## Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996.



A notice of completeness letter was mailed to the source on January 22, 1997.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 9 - 11.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
styrene	greater than 10
TOTAL	greater than 10

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16))
  - (1) VOC's are equal to or greater than 100 tons per year and
  - (2) any single HAP is equal to or greater than ten (10) tons per year

Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and fugitive volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	4.781
PM-10	6.475
SO <sub>2</sub>	0.002
VOC	26.011
CO	0.060
NO <sub>x</sub>	0.475
HAP (styrene)	26.011

### County Attainment Status

The source is located in Hamilton County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Hamilton County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The storage tanks T<sub>1</sub> - T<sub>6</sub> at this facility are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b Subpart Kb), due to each tank capacity being less than 40 cubic meters.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source, because the source is not one of the listed sources for NESHAP regulation.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 (PSD)

The potential to emit (PTE) any air pollutant from the source is less than 250 tons per year, and the source is not one of the 28 listed source categories, therefore, 326 IAC 2-2 (PSD) will not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred tons per year of VOC and PM-10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) for any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

Since Industrial Dielectrics Inc. has the potential to emit more than 100 tons per year of VOC, 326 IAC 8-6 could be applicable. However, since the source was not constructed after October 7, 1974 and prior to January 1, 1980, 326 IAC 8-6 does not apply.

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on Dec. 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-3-2 (Process Operations)

- (1) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the sanded plastic sheet processes, bulk molding compound processes, fiberglass pultrusion molding machines, and fiberglass chips processes shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

Facility	P = process weight tons/hr	E = allowable emissions lbs/hr
Plastic sheet processes (B <sub>1,2,3</sub> )	.3075	1.86
Bulk molding processes (B <sub>4</sub> )	4 lines X 0.665 = 2.66	7.90
Fiberglass pultrusion processes (B <sub>5,6</sub> )	0.0545	0.58
Fiberglass chips processes (B <sub>7</sub> )	0.25	1.62

The baghouses (B<sub>1,2,3</sub>) shall be in operation at all times the sanded plastic sheet processes are in operation, the baghouse (B<sub>4</sub>) shall be in operation at all times the bulk molding compound processes are in operation, the baghouses (B<sub>5,6</sub>) shall be in operation at all time the fiberglass pultrusion molding machines are in operation, and the baghouse (B<sub>7</sub>) shall be in operation at all times the fiberglass chips processes are in operation, in order to comply with this limit.

- (2) Pursuant to CP 057-4373, the baghouses B<sub>1</sub> - B<sub>7</sub> shall be in operation at all times the machining is in operation. At all times when the baghouses are in operation, the baghouses' outlet air shall not exceed 10% opacity. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-5 may apply at the discretion of IDEM.

### 326 IAC 8-1-6 (Best Available Control Technology)

Mixers M<sub>1</sub>, M<sub>2</sub>, M<sub>3</sub>, M<sub>4</sub>, M<sub>14</sub>, M<sub>15</sub>, scale SC<sub>1</sub>, oven O<sub>1</sub>, pultrusion machine P<sub>1</sub>, and seven bulk molding compound lines with mixers M<sub>5</sub> - M<sub>11</sub> were constructed prior to Jan 1, 1980, so 326 IAC 8-1-6 does not apply to those units. Unpermitted 8<sup>th</sup> and 9<sup>th</sup> bulk molding compound lines with mixers M<sub>12</sub> and M<sub>13</sub> were constructed in 1996 and each have PTE VOC greater than 25 tons per year. Therefore, VOC emissions from M<sub>12</sub> and M<sub>13</sub> shall be limited to less than 25 tons per 12 consecutive month period, each, by limiting input VOC such that:

$$\begin{array}{ccccccc} \text{Pounds of VOC per Gallon coating} & * & \text{Gal. of material} & * & 1330 \text{ lbs/hr} & * & (8760 \text{ hr/yr}) * (1 \text{ ton}/2000 \text{ lbs}) * \text{flash off factor} < 25 \text{ tons/year} \\ (\text{lb/gal}) & & (\text{gal/lb.}) & & & & (3 \%) \end{array}$$

This limitation, based on maximum production of 1330 lbs/hr for each line and a flash off factor of 3%, will prevent VOC emissions from the 8<sup>th</sup> and 9<sup>th</sup> bulk molding compound lines from being greater than 25 tons per 12 consecutive month period. Therefore, 326 IAC 8-1-6 is not applicable.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

### Conclusion

The operation of this fiberglass facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T057-7683-00042.**

# **APPENDIX    A**

Revised Calculations  
State Potential VOC and Particulate Emissions  
From Surface Coating Operations  
Industrial Dielectrics Inc.  
Noblesville, Indiana  
December 12, 1996

CP# 057-4373  
Pit ID 057-00042

Material	Density	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VO per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons/yr	Particulate Potential tons/yr	lb VOC /gal solids	Transfer Efficiency
<b>ULK MOLDING COMPOUND</b>	<b>lb/gal</b>																
Poly Mold, Low Styrene						100.00%	70	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - CAC-1A	7.82	0.00%	0.00%	0.00%	0.00%	100.00%	8	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - M-60	23.77	0.00%	0.00%	0.00%	0.00%	100.00%	10	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Pigment - Sacoltolith	33.36	0.00%	0.00%	0.00%	0.00%	100.00%	3	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Release Agent - Zinc St.	9.17	0.00%	0.00%	0.00%	0.00%	100.00%	0.2	6	0.03	7.00	7.00	0.25	6.05	1.10	0.00	N/A	100%
Catalyst - TBIC	7.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.1	6	0.03	9.50	9.50	0.17	4.10	0.75	0.00	N/A	100%
Inhibitor - Mod E	9.50	100.00%	0.00%	100.00%	0.00%	0.00%	0.1	6	0.03	3.48	3.48	8.78	210.75	38.46	0.00	0.19	100%
Polyester Resin - GR14029	9.17	38.00%	0.00%	38.00%	0.00%	53.90%	14	6	0.03	5.47	5.47	2.96	70.95	12.95	0.00	0.00	100%
Polyester Resin - COR-20	9.17	59.70%	0.00%	59.70%	0.00%	27.60%	3	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Fiberglass - 1/4 CHPGLS	16.35	0.00%	0.00%	0.00%	0.00%	100.00%	32	6	0.03	0.00	0.00	0.58	13.99	2.55	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%	1.00%	0.011	6	1	8.83	8.83	0.58	13.99	2.55	0.00	883.08	100%
Poly Mold, Med Styrene						100.00%	35	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - ATH2	22.52	0.00%	0.00%	0.00%	0.00%	100.00%	36	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - M-60	23.77	0.00%	0.00%	0.00%	0.00%	100.00%	14	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - CAC-2A	6.96	0.00%	0.00%	0.50%	0.00%	100.00%	3	6	0.03	0.05	0.05	0.02	0.59	0.11	0.00	0.00	100%
Release Agent - Zinc St.	9.17	0.50%	0.00%	52.00%	0.00%	48.00%	1	6	0.03	4.34	4.34	0.78	18.73	3.42	0.00	0.27	100%
Styrene	8.34	52.00%	0.00%	75.00%	0.00%	24.00%	0.1	6	0.03	6.50	6.50	0.12	2.81	0.51	0.00	0.81	100%
Inhibitor - Mod H	8.67	75.00%	0.00%	100.00%	0.00%	0.00%	0.2	6	0.03	8.66	8.66	0.31	7.48	1.37	0.00	N/A	100%
Catalyst - TBP	8.66	100.00%	0.00%	38.00%	0.00%	53.90%	15	6	0.03	3.48	3.48	9.41	225.80	41.21	0.00	0.19	100%
Polyester Resin - GR14029	9.17	38.00%	0.00%	38.00%	0.00%	53.90%	15	6	0.03	5.47	5.47	11.82	283.80	51.79	0.00	0.60	100%
Polyester Resin - COR-20	9.17	59.70%	0.00%	59.70%	0.00%	27.60%	12	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Fiberglass - 1/4 CHPGLS	16.35	0.00%	0.00%	0.00%	0.00%	100.00%	48	6	0.03	0.00	0.00	0.58	13.99	2.55	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%	1.00%	0.011	6	1	8.83	8.83	0.58	13.99	2.55	0.00	883.08	100%
Poly Mold, High Styrene						100.00%	32	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - CA5	24.59	0.00%	0.00%	0.00%	0.00%	100.00%	27	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - ATH1	22.52	0.00%	0.00%	0.00%	0.00%	99.50%	2	6	0.03	0.05	0.05	0.02	0.40	0.07	0.00	0.00	100%
Release Agent - Zinc St.	9.17	0.50%	0.00%	0.50%	0.00%	100.00%	1	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Pigment - PS02052	7.01	0.00%	0.00%	0.00%	0.00%	0.00%	5	6	0.03	7.56	7.56	6.80	163.29	29.80	0.00	N/A	100%
Styrene	7.59	99.60%	0.00%	99.60%	0.00%	0.00%	0.1	6	0.03	6.50	6.50	0.12	2.81	0.51	0.00	0.81	100%
Inhibitor - Mod H	8.67	75.00%	0.00%	75.00%	0.00%	24.00%	0.2	6	0.03	8.66	8.66	0.31	7.48	1.37	0.00	N/A	100%
Catalyst - TBP	8.66	100.00%	0.00%	100.00%	0.00%	0.00%	0.2	6	0.03	3.58	3.58	12.23	293.54	53.57	0.00	0.20	100%
Polyester Resin - GR14027	9.17	39.00%	0.00%	39.00%	0.00%	52.70%	19	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Shrink Control - Mic FN510	7.71	0.00%	0.00%	0.00%	0.00%	100.00%	12	6	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Fiberglass - 1/4 CHPGLS	16.35	0.00%	0.00%	0.00%	0.00%	100.00%	56	6	0.03	0.00	0.00	0.58	13.99	2.55	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%	1.00%	0.011	6	1	8.83	8.83	0.58	13.99	2.55	0.00	883.08	100%

First Page Worst Case TOTAL:

100.96 0.00

State Potential Emissions

Add worst case coating to all solvents

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1 - Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Flash-off (factor)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Flash-off (factor)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Flash-off (factor)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Transfer efficiency) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
Pounds VOC per Gallon of Solids = (lbs/gal) \* (weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

Revised Calculations

State Potential VOC and Particulate Emissions  
From Surface Coating Operations  
Industrial Dielectrics Inc.  
Noblesville, Indiana  
December 12, 1996

CP# 057-4373  
Pit ID 057-00042

Material	Density lb/gal	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VO per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons/yr	Particulate Potential tons/yr	lb VOC /gal solids	Transfer Efficiency
<b>CLOSED MOLDING</b>																	
Poly Laminate, Low Styrene																	
Polyester Resin - GR14027	9.17	39.00%	0.00%	39.00%	0.00%	52.70%	18	1	0.07	3.58	3.58	4.51	108.15	19.74	0.00	0.48	100%
Styrene	8.34	75.00%	0.00%	75.00%	0.00%	24.00%	6	1	0.07	6.26	6.26	2.63	63.05	11.51	0.00	1.75	100%
Inhibitor - Mod H	8.67	75.00%	0.00%	75.00%	0.00%	0.00%	0.1	1	0.07	6.50	6.50	0.05	1.09	0.20	0.00	1.90	100%
Catalyst - TBP	8.66	100.00%	0.00%	100.00%	0.00%	8.50%	0.2	1	0.07	8.66	8.66	0.12	2.91	0.53	0.00	N/A	100%
Catalyst - Lupersol 256	7.67	91.50%	0.00%	0.00%	0.00%	100.00%	2	1	0.07	7.02	7.02	0.10	2.36	0.43	0.00	5.78	100%
Release Agent - Zinc St.	9.17	0.00%	0.00%	0.00%	0.00%	100.00%	37	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - CAC-1A	7.82	0.00%	0.00%	0.00%	0.00%	100.00%	1	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Pigment - CM45311	15.68	0.00%	0.00%	0.00%	0.00%	100.00%	37	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	883.08	100%
Fiberglass - M8641	3.60	0.00%	0.00%	0.00%	0.00%	1.00%	0.011	1	1	8.83	8.83	0.10	2.33	0.43	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%												
Poly Laminate, High Styrene																	
Polyester Resin - GR14027	9.17	39.00%	0.00%	39.00%	0.00%	52.70%	18	1	0.07	3.58	3.58	4.51	108.15	19.74	0.00	0.48	100%
Styrene	7.59	59.60%	0.00%	59.60%	0.00%	0.00%	6	1	0.07	7.56	7.56	3.18	76.20	13.91	0.00	N/A	100%
Inhibitor - Mod H	8.67	75.00%	0.00%	75.00%	0.00%	24.00%	0.1	1	0.07	6.50	6.50	0.05	1.09	0.20	0.00	1.90	100%
Catalyst - TBP	8.66	100.00%	0.00%	100.00%	0.00%	0.00%	0.2	1	0.07	8.66	8.66	0.12	2.91	0.53	0.00	N/A	100%
Catalyst - Lupersol 256	7.67	91.50%	0.00%	0.00%	0.00%	100.00%	2	1	0.07	7.02	7.02	0.10	2.36	0.43	0.00	5.78	100%
Release Agent - Zinc St.	9.17	0.00%	0.00%	0.00%	0.00%	100.00%	37	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - ATH1	22.52	0.00%	0.00%	0.00%	0.00%	100.00%	1	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Pigment - CM7228	13.26	0.00%	0.00%	0.00%	0.00%	100.00%	35	1	0.07	0.00	0.00	0.00	0.00	0.00	0.00	883.08	100%
Fiberglass - M8641	3.60	0.00%	0.00%	0.00%	0.00%	1.00%	0.011	1	1	8.83	8.83	0.10	2.33	0.43	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%												
Poly Extrusion Compound																	
Polyester Resin - GR14027	9.17	39.00%	0.00%	39.00%	0.00%	52.70%	21	0.2	0.07	3.58	3.58	1.05	25.23	4.61	0.00	0.48	100%
Styrene	8.34	100.00%	0.00%	100.00%	0.00%	0.00%	2	0.2	0.07	8.34	8.34	0.23	5.60	1.02	0.00	N/A	100%
Inhibitor - Mod H	8.67	75.00%	0.00%	75.00%	0.00%	24.00%	0.1	0.2	0.07	6.50	6.50	0.01	0.22	0.04	0.00	1.90	100%
Catalyst - TBP	8.66	100.00%	0.00%	100.00%	0.00%	0.00%	0.2	0.2	0.07	8.66	8.66	0.02	0.58	0.11	0.00	N/A	100%
Catalyst - Percadox 16/N	9.50	0.01%	0.00%	0.01%	0.00%	99.99%	1	0.2	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Release Agent - MoldgardX	8.20	0.01%	0.00%	0.01%	0.00%	100.00%	9	0.2	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Filler - CAC-1A	7.82	0.00%	0.00%	0.00%	0.00%	100.00%	1	0.2	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Pigment - CM5860	13.34	0.00%	0.00%	0.00%	0.00%	100.00%	2	0.2	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Shrink Control - Mic FN510	7.71	0.00%	0.00%	0.00%	0.00%	100.00%	80	0.2	0.07	0.00	0.00	0.00	0.00	0.00	0.00	883.08	100%
Fiberglass - N751	3.60	0.00%	0.00%	0.00%	0.00%	1.00%	0.011	0.2	1	8.83	8.83	0.02	0.47	0.09	0.00	883.08	100%
Ship Shape	8.92	99.00%	0.00%	99.00%	0.00%												

Second Page Worst Case TOTAL:

41.09 0.00

State Potential Emissions

Add worst case coating to all solvents

Worst Case GRAND TOTAL:

142.05 0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1 - Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Flash-off (factor)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hrs / 1 day) \* Flash-off (factor)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (8760 hr/yr) \* (1 ton / 2000 lbs) \* Flash-off (factor)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1 - Weight % Volatiles) \* (8760 hr/yr) \* (1 ton / 2000 lbs)  
Pounds VOC per Gallon of Solids = (lbs/gal) \* (weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Industrial Dielectrics, Inc.  
Source Location: 407 S. 7<sup>th</sup> St., Noblesville, IN 46060  
County: Hamilton  
SIC Code: 3087  
Operation Permit No.: T057-7683-00042  
Permit Reviewer: B. J. Goldblatt

On June 10, 1999, the Office of Air Management (OAM) had a notice published in the Topics Newspapers Inks, Noblesville, Indiana, stating that Industrial Dielectrics, Inc., had applied for a Part 70 Operating Permit to operate a fiberglass molding, lamination, and pultrusion plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

In response to public comments, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

The following comments on the proposed Part 70 permit were submitted by Industrial Dielectrics, Inc., on July 13, 1999.

#### Comment #1:

RE: A.2(a) Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]  
and  
D.1(a) Facility Description [326 IAC 2-7-5(15)] - *Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, connected to sander SN<sub>1</sub>, with SN<sub>1</sub> capacity of 615 pounds per hour, each saw equipped with an indoor baghouse, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.*

"The two saws are not physically connected to sander SN<sub>1</sub>. The control devices B<sub>1</sub> and B<sub>2</sub> are single stage workshop-type vacuums that control emissions from the two saws."



### Response #1:

The following changes have been made to Sections A.2 and D.1:

- (a) Two saws, identified as SA<sub>1</sub> and SA<sub>2</sub>, for plastic sheet production, ~~connected to sander SN<sub>1</sub>, with SN<sub>1</sub> capacity of 615 pounds per hour, each with a maximum capacity of 200 pounds per hour, and each saw equipped with an indoor baghouse~~ **a single stage workshop-type vacuum/bag**, B<sub>1</sub> and B<sub>2</sub>, with no outside exhaust.

### Comment # 2:

RE: A.2(g) Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)] and  
D.1(g) Facility Description [326 IAC 2-7-5(15)] - *One electric oven, identified as O<sub>1</sub>, for heat molded bulk molding compound production, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.*

"The oven is not used to generate usable product, but rather it is used to render unusable raw materials remaining in drums into a solid form for disposal purposes."

### Response #2:

The following changes have been made to Sections A.2 and D.1:

- (g) One electric oven, identified as O<sub>1</sub>, for **treatment of unusable raw materials prior to disposal** ~~heat molded bulk molding compound production~~, with a maximum capacity of 400 pounds per hour, and exhausting to stack S<sub>5</sub>.

### Comment #3:

RE: A.2 (h) Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)] and  
D.1(h) Facility Description [326 IAC 2-7-5(15)] - *One fiberglass pultrusion molding machine, identified as P<sub>1</sub>, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B<sub>5</sub> and B<sub>6</sub>, that exhaust within the building, with no outside exhaust.*

"The pultrusion emission unit has an associated stack, which was originally indicated in the permit application. S<sub>7</sub> would be an appropriate stack designation following the existing stack numbering sequence."

### Response #3:

The following changes have been made to Sections A.2 and D.1:

- (h) One fiberglass pultrusion molding machine, identified as P<sub>1</sub>, for fiberglass pultrusion production, with a maximum capacity of 109 pounds per hour, and connected to two small workshop-type baghouses, B<sub>5</sub> and B<sub>6</sub>, ~~that exhaust within the building, with no outside exhaust and exhausting to stack S<sub>7</sub>.~~

**Comment #4:**

RE: B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)][326 IAC 2-7-5(6)(E)] - (a) *The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:*

"Industrial Dielectrics intends to develop in-house emission data for the processes described in the original permit applications and in this draft permit. A testing plan is being developed that will set forth protocols to be followed. Emission factors previously utilized are considered to be excessively high, but represented the only applicable emission data at that time."

**Response #4:**

OAM should be notified of any future emission data or changes in potential emissions. An amendment or modification may be made to the Title V permit to reflect such emission changes. No changes have been made as a result of this comment.

**Comment #5:**

RE: D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6] - (a) *Mixers M<sub>1</sub>, M<sub>2</sub>, M<sub>3</sub>, M<sub>4</sub>, M<sub>14</sub>, M<sub>15</sub>, scale SC<sub>1</sub>, oven O<sub>1</sub>, pultrusion machine P<sub>1</sub>, and seven bulk molding compound lines with mixers M<sub>5</sub> - M<sub>11</sub> were constructed prior to Jan 1, 1980, so 326 IAC 8-1-6 does not apply to those units. Bulk molding compound lines with mixers M<sub>12</sub> and M<sub>13</sub> were constructed in 1996, and each have PTE VOC greater than 25 tons per year.*

RE: D.1.7 VOC Emissions - *Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage to mixers M<sub>12</sub> and M<sub>13</sub> for the most recent month.*

"It is questioned as to why M<sub>12</sub> was not considered a direct replacement for one of the eighth mixers identified in the existing construction permit. Allowable emissions for mixer M<sub>12</sub> are equal to or less than the mixer that was replaced."

**Response #5:**

326 IAC 8-1-6 specifies that new facilities with potential emissions of 25 tons or more per year shall reduce VOC emissions using BACT. The rule does not refer to any provisions for "direct replacement" or "equal to or less than" emissions. No changes have been made as a result of this comment.

**Comment #6:**

RE: D.1.8 Particulate Matter (PM) - *Pursuant to CP 057-4373-00042 issued on May 13, 1996, the baghouses B<sub>1,2,3</sub> for PM control shall be in operation at all times the sanded plastic sheet processes are in operation. . .*

"It should be noted for clarification that baghouses B<sub>1</sub> and B<sub>2</sub> (small workshop-type vacuums) are associated with saws SA<sub>1</sub> and SA<sub>2</sub> and are only operated during sawing operations. The baghouses are not connected to sander SN<sub>1</sub>. Baghouse B<sub>3</sub> is to be operated during all sanding operations."

#### Response #6:

The following changes have been made to D.1.8:

Pursuant to CP 057-4373-00042 issued on May 13, 1996, the **vacuum**/baghouses ~~B<sub>1,2,3</sub>~~ **B<sub>1,2</sub>** for PM control shall be in operation at all times the ~~sanded plastic sheet~~ **sawing** processes are in operation. **Baghouse B<sub>3</sub> shall be in operation at all times the sander is in operation.** Baghouse B<sub>4</sub> shall be in operation at all times the bulk molding compound processes are in operation. Baghouses B<sub>5,6</sub> shall be in operation at all times the fiberglass pultrusion molding machines are in operation. Baghouse B<sub>7</sub> shall be in operation at all times the fiberglass chips processes are in operation.

#### Comment #7

RE: D.1.9 Record Keeping Requirements *-(a) (2) A log of the dates of use;*

"It is interpreted that dates-of-use means the combined usage for the month, and not the recording of the specific day of use. There are no state or federal requirements for daily record keeping as presently understood."

#### Response #7

The interpretation is correct. No changes have been made as a result of this comment.

The following comments to the Technical Support Document (TSD) were submitted by Industrial Dielectrics, Inc., on July 13, 1999. The original TSD will not be altered, but changes will be noted in this TSD Addendum.

**Comment #8** for Permitted Emission Units and Pollution Control Equipment is comparable to comments # 1, 2, and 3, above, to the Title V Permit.

#### Response #8

As a result of Comments # 1, 2, and 3, above, Emission Units and Pollution Control Equipment descriptions have been modified in the Title V Permit. See Responses # 1, 2, and 3.

#### Comment #9

RE: Unpermitted Emission Units and Pollution Control Equipment *-(a) Two bulk molding compound mixers, installed in 1996, and identified as M<sub>12</sub> and M<sub>13</sub>, for bulk molding compound production, each with a maximum capacity of 1330 pounds per hour, equipped with the same baghouse B<sub>4</sub> as mixers M<sub>5</sub> - M<sub>11</sub>, and all exhausting to stack S<sub>4</sub>.*

"It is questioned as to why M<sub>12</sub> was not considered a direct replacement for one of the eighth mixers identified in the existing construction permit. Allowable emissions for mixer M<sub>12</sub> are equal to or less than the mixer that was replaced. Therefore, the emission unit M<sub>12</sub> should not have constituted a modification requiring a construction permit."

### **Response #9**

Pursuant to IAC 2-7-10.5(b), emission units that directly replace existing units may be constructed "without prior approval", but an application for a permit or permit revision must be made "no later than 30 calendar days after initiating the repair or replacement". No changes have been noted in this Addendum as a result of this comment.

**Comment # 10** for State Rule Applicability - Individual Facilities (Process Operations) is comparable to Comment # 6.

### **Response # 10**

As a result of Comment # 6, D.1.8 has been modified in the Part 70 Permit. Please see Response #6.

**Comment # 11** for State Rule Applicability - Individual Facilities (BACT) is comparable to Comment # 5.

### **Response # 11**

Please see Response #5

The following comment on the proposed Part 70 permit was submitted by Harold Collins on July 12, 1999.

### **Comment # 12 :**

"I am writing in Regard to the Part. 70 permit for Industrical Dielectrics Inc, In Hamilton Country. I am against this. The Items that is beeing let into the air is a health hazzerd. We already have an oder problem here, In which The State say is unhealthy to breath. You can check with the state. Some of our Neighbor Can not Get out, because of this. Not counted the dust and dirt, and what power That fill the air sometime when They dump it in To the trash recipical outside. Plus the truck's that runs up almost in Neighbor yards. How Much must This Neighborhood and Neighbor Must give and put up with. It doesn't do any good to talk To the City or State or Federal government. I guesst that they will get what They want. Seem like They usually do. So the children will breathe this oder and Stems that will be put into the air, and on down the line of life may end up with a Serious health problem. I know 99.9% of the people invlved in this doesn't put up with This problem. because The do not live in this Neighborhood. It Seems as time goes on this Neighborhood comes less inperment. I have Spent 65% of my life right around here. and also other. Most of the people says it doesn't do No good To fight City Hall (There Right)!"

### **Response # 12 :**

OAM is aware of the difficulties that can arise in neighborhoods which are shared by industries and homeowners. Local, State, and Federal rules attempt to address the interests of both entities. When a homeowner experiences situations in which the industry has broken an agreement it has made (via a permit) with the public, the homeowner is encouraged to vigorously pursue a resolution to the problem. OAM is structured so that a citizen can approach staff and management in a hierarchical fashion. A recommended approach for Mr. Collins would be to contact the first person in the following list, and if a resolution can not be found, to contact the second person. If a suggested resolution has not worked/is not working, each subsequent person within OAM could be contacted until a satisfactory resolution is found.

1. OAM Inspector- Marc Goldman 317 / 233 - 6869
2. OAM Compliance Branch Chief- Phil Perry 317 / 232 - 8457
3. OAM Assistant Commissioner- Janet McCabe 317 / 232 - 8222

The proposed Title V Permit specifically relates to Mr. Collins' comments in the following ways:

- a) There are no Local, State, or Federal rules relative to Title V Permits which address odors.
- b) Sections C.1, C.5, C.6, D.1.2, and D.1.8 specifically address the operational requirements for Industrial Dielectrics to limit and control dust and particulate matter such as air-borne dirt and powder.
- c) Section C.2 specifically addresses the operational requirements for Industrial Dielectrics to limit opacity. There are no Local, State, or Federal rules relative to Title V Permits which address condensed water vapor emissions, i.e. steam.